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9	tlindquist@sheppardmullin.com	
10	Attorneys for Defendant and Counterclaimant LIBERTY MUTUAL FIRE INSURANCE COM	IPANY
12	UNITED STATES	DISTRICT COURT
13	NORTHERN DISTR	ICT OF CALIFORNIA
14	LARGO CONCRETE, INC., a California Corporation; N.M.N. CONSTRUCTION,	Case No. C07-04651 CRB (ADR)
15	INC., a California Corporation,	Hon. Charles R. Breyer [Complaint Filed: September 10, 2007]
16	Plaintiffs,	NOTICE OF FILING AND SERVICE OF
17	v.	EXHIBITS B AND F TO FARKAS DECLARATION
18 19	LIBERTY MUTUAL FIRE INSURANCE COMPANY, a Massachusetts Corporation, and DOES 1 through 100, inclusive.	
20	Defendants.	Date: December 21, 2007 Time: 10:00 a.m.
21	AND RELATED COUNTERCLAIM	Place: Courtroom 8
22		
23	TO THE COURT, AND TO ALL	PARTIES AND THEIR ATTORNEYS OF
24	RECORD:	
25	PLEASE TAKE NOTICE that de	fendant Liberty Mutual Fire Insurance Company
26	is hereby filing and serving true and correct copi	es of Exhibits B and F to the Declaration of Greg
27	Farkas. By Order dated December 19, 2007 (the	"Order"), the Court denied defendant's
28	Administrative Motion to File Exhibits B and F	to Mr. Farkas' Declaration Under Seal for <i>In</i>

Camera Review. Although defendant remains concerned about the disclosure of documents that are subject to the attorney-client privilege and the work product doctrine, in view of the Court's statement in the Order that it will not consider evidence that has not been shared with opposing counsel, defendant hereby files Exhibits B and F and concurrently serves copies of those exhibits on opposing counsel. By filing and serving these Exhibits, defendant does not intend to waive any privilege with respect to Exhibits B and F, and respectfully requests, now that the documents have been disclosed to opposing counsel, that the Court reconsider its Order denying defendant's motion to file them under seal.

Dated: December 19, 2007

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Ву

TED C/LINDQUIST, III

Attorneys for Defendant and Counterclaimant LIBERTY MUTUAL FIRE INSURANCE COMPANY

EXHIBIT "B"

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Fact Investigation/Development - Review and analyze Aces notes for use in discovery and motion workup.	Dispositive Motions - Analyze case law interpretation of whether CCP 340.9 is subject to equitable toiling or absolute on its face.	Pleadings - Continue preparing Notice of Removal of Action; declaration of Susan Olson in support of same; Notice to Adverse Party re: removal and Local Rule 83-1.5 Certification as to interested Parties.	Dispositive Motions - Prepare correspondence to plaintiff's counsel re: same.	Dispositive Motions - Telephone conference with plaintiff's counsel re: extension to respond to complaint.	Dispositive Motions - Review and analyze legislative history of Civil Code 340.9 for use in same.	Dispositive Motions - Analyze case law interpretation addressing whether plaintiff's sale of her house allows application of Insurance Code 2071 to bar her claim for Motion to Dismiss and/or Motion for Summary Judgment.	Analysis/Strategy - Analyze underlying file materials re: timing of underlying events for motion to dismiss or for summary judgment.	Dispositive Motions - Discuss Motion to Dismisss and/or Motion for Summary Adjudication with Susan Olson.	Dispositive Motions - Analyze case law addressing whether earthquake revival statute tolls revived claims during period that claim is reopened for motion to dismiss/ summary judgment.	Analysis/Strategy - Analyze case law interpretation of whether LMI tolling applies to CCP 340.9, and, if so, what actions are required by insurer to effect tolling for motion to dismiss or summary judgment.	Analysis/Strategy - Analyze case law allowing recovery for damages for lesser of diminuiton in value or cost of repair where homeowner has not actually incurred out of pocket expense to pay for repairs for motion workup or discovery.	Analysis/Strategy - Prepare memo to Teresa Ruffino re: market value research and discuss same with her.	Analysis/Strategy - Discuss motion and discovery workup with Susan Oison.	Fact Investigation/Development - Review and analyze claim file materials for possible motion to dismiss and/or motion for summary judgment and for use in preparing discovery.	Pteadings - Prepare local rule certification as to Interested Parties.	Pleadings - Prepare Notice to Adverse Party of Removal of Action to Federal Court.	Pleadings - Prepare declaration of Susan Olson in support of Notice of Removal of Action to Federal court.	Pleadings - Prepare Notice of Removal of Action to Federal Court.	Pleadings - Discuss motions to remove, dismiss and for summary judgment with Susan Olson.	Pleadings - Review Ashou complaint for removal and responsive pleadings.	
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Dispositive Motions - Review and analyze authorities for judicial notice of various documents in support of demurrer and prepare Request for Judicial Notice authenticating 7	Analysis/Strategy - Review and analyze plausibility of attacking complaint on general statutes of limitations appliable to breach of contract and bad faith claims under Code of Civil Procedure 337 and 339(1) for dispositive motion.	Pleadings - Prepare Motion to Strike.	Fact Investigation/Development - Review and analyze complaint for motion to strike.	Dispositive Motions - Draft demurrer to complaint addressing statute of limitations preclusion; inapplicability of equitable estoppel and threshold appraisal requirement precluding action.	Fact Investigation/Development - Review and analyze comparable information for property from 10/93 to 3/94 and 10/96 to 2/97 and discuss same with Teresa Rufino.	Analysis/Strategy - Discuss case workup in state court in lieu of removal with Susan Olson.	Pleadings - Telephone conferences with court re; removal of action and decision not to remove same.	Dispositive Motions - Analyze case law tinding that revival statute is not subject to tolling for same.	Dispositive Motions - Discuss estoppel and statute of limitations arguments for same with Susan Olson.	Dispositive Motions - Review and analyze case law addressing genuine dispute with insured precludes bad faith for same, including reliance on independant experts for same.	Dispositive Motions - keview and analyze case law Dispositive Motions - keview and analyze case law of addressing provision of policy benefits precludes breach of contract and bad faith for motions for summary judgment and to dismiss.	Pleadings - Telephone conterences with court ret removal or action.	Pleadings - Prepare Civil Case Cover Sheets for Ivolice of Removal.	Analysis/Strategy - Prepare memo to file re: Ashou counsers representations regarding client for investigation regarding same.	Document Production - Prepare subpoenas to county recorders office and building and safety department for earthquake records and review available information on-line.	Pleadings - Prepare stipulation and order re: extension of Liberty's time to respond to complaint per district court requirements.	Document's in Managerinent - releptions content to Stephen Losh, plaintiff's counsel, re: removal of action to federal court and stipulation to extend date to respond to complaint.	Pleadings - Continue preparing removal documents, identify exhibits to same and finalize same.	4
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A A	Dispositive Motions - Telephor withdrawal of Demurrer and M to file first amended complaint	Analysis/Strategy - Continue preparing comprehensive evaluation letter.	Analysis/Strategy - Begin preparing initial evaluation of action letter to client.	Fact investigation/Development - Review and analyze California public records re: Raymonda Ashou crimina other relevant history for use in working up initial eval. report.	Other Case Assessment, Development letter to client re: responsive pleadings	Other Case Assessment, Development and Admin Prepare correspondence to client re: responsive plea and brief update.	Document Production - Telephone confere production of County Recorder documents	Document Production - Telephone call from LA Building Department re: status of production of documents for plaintiff's home.	Dispositive Motions - Compile numerous exhibits for demurrer and finalize demurrer, motion to strike; requidicial notice and notice re: remand for filing.	Document Production - Telephone conference with DDS status of production of county recorder's file materials.	Pleadings - Prepare Notice of Order Remanding Case State Court.	Other Case Assessment, Development and Admin Continue preparing case summary for home office m	Other Case Assessment, Development and Admin Telephone conference with plaintiff's counsel re: case remand to the state court.	Other Case Assessment, Development and Admin Continue preparing case summary for meeting with home office personel.	Document/File Management - Telephone conference with court re: status of case remand to state court.	Other Case Assessment, Development and Admin Prepare summary of case for meetings with home office	Document Production - Telephone conference with County Recorders office and DDS re: production of complete file materials requested.	Fact Investigation/Development - Review documents produced by County Recorders Office.	Document/File Management - Prepare correspondence Mr. Losh re: same.	Pleadings - Prepare Stipulation re; same.	Document/File Management - Telephone conference with plaintiff's counsel, Stephen Losh re: stipulation to extend response date pending remand to state court.	000
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Dispositive Motions - Prepare memo to file analyzing same.	Dispositive Motions - Telephone call from Stephen Losh re: withdrawal of Demurrer and Motion to Strike to allow same to file first amended complaint.	sive	on of	Fact Investigation/Development - Review and analyze California public records re: Raymonda Ashou oriminal and other relevant history for use in working up initial evaluation report.	Other Case Assessment, Development and Admin Finalize letter to client re: responsive pleadings.	Other Case Assessment, Development and Admin Prepare correspondence to client re: responsive pleadings and brief update.	Document Production - Telephone conference with DDS reproduction of County Recorder documents.	for	Dispositive Motions - Compile numerous exhibits for demurrer and finalize demurrer; motion to strike; request for judicial notice and notice re: remand for filing.	DDS regals.	ase to	₽	388) home	ce with	office.	County te file	\$	ance to		ce with xtend	
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Written Discovery (RFAs & Interrogatories) - Prepare	Document Production - Review file re: production of requested documents; and segregating privileged and irrelevant documents.	Written Discovery (RFAs & Interrogatories) - Prepare responses to plaintiff's production requests.	Written Discovery (RFAs & Interrogatories) - Review file and prepare responses to plaintiffs special interrogatories.	Pleadings - Continue preparing Motion to Strike puritive damages and improper allegations from first amended complaint.	Pleadings - Prepare Notice of Withdrawal of Demurret and Motion to Strike in light of plaintiff's amended complaint.	Dispositive Motions - Prepare demurrer to First Amended Complaint.	Pleadings - telephone conference with stephen Lost it is withdrawal of demurrer and motion to strike as moot in light of amended complaint.	Written Discovery (RFAs & interrogatories) - review plaintiff's special interrogatories and production requests.	Pleadings - Prepare motion to strike improper damages allegations and irrelevant and inflammatory allegations.	Analysis/Strategy - Review and analyze case law re: striking plaintiff's irrelevant and prejudicial allegations regarding her employment.	Analysis/Strategy - Review and analyze case law re: authority to strike plaintiff's allegation that Liberty misled her by telling her she only needed to cover her mortgage balance for motion to strike.	Dispositive Motions - Review and analyze case law allowing court to disregard self-serving allegations in amended complaint where contradicted by prior allegations for demurrer to amended complaint.	Dispositive Motions - Review and analyze case law authorizing court to sustain demurrer without leave to amend where plaintiff has tried to unsuccessfully amend for demurrer to amended complaint.	Pleadings - Prepare memo to file re: same.	Pleadings - Review and analyze Plaintiff's First Amended Complaint and caselaw cited therein.	Document Production - Review and analyze documents produced by the County Recorder's Office for plaintiff's insured residence.	Document Production - Review and analyze documents produced by the City of Los Angeles, Department of Building and Safety.	Analysis/Strategy - Telephone conference with plaintiff's counsel, Stephen Losh, re: amending complaint in lieu of Opposing demurrer and motion to strike and prepare memo to file re: same.	Dispositive Motions - Telephone conference with plaintiff's counsel Stephen Losh re: withdrawal of demurrer in light of appraisal demand.	
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Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's form interrogatories.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's admission requests.	Fact Investigation/Development - Prepare issuer to client entre email/memo to Susan Oison re: demurrer and motion to strike amended complaint.	Dispositive Motions - Prepare request for Justical native in support of demurrer and motion to strike and cases and documentation in support of same.	Pleadings - Continue preparing motion to strike attenued compilarint.	Dispositive Motions - Commue preparing certainer to assistance amended complaint.	Analysis/Strategy - Prepare memo to life it: preclusion of second amended complaint without leave if responsive pleadings filed before same.	uspositive Motions - review and analyze case aw is whether appraisal requires case dismissal, if so, under what conditions and to what extent for demurrer to first amended complaint.	above issues. Devices and applied case law re-	requirements to waive statute of limitation for supplementation to demurrer to amended complaint.	Pleadings - Continue preparing Motion to Strike Amended Complaint. Complaint. Pleadings - Continue preparing Motion to Strike Amended	Pleadings - Prepare email addressing same.	Analysis/Strategy - Analyze whether plaintiff can file amended complaint without stipulation from Liberty.	Pleadings - Telephone call from Angela Leon, plaintiffs counsel, re: proposed Second Amended Complaint.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's production requests.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiffs admission requests.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiffs' special interrogatories.	Document Production - Continue reviewing and redacting documents to be produced in compliance with plaintiff's production requests.	Dispositive Motions - Supplement demurrer to reflect above argument.	Dispositive Motions - Review and analyze case law re: whether an insurer waives the one year policy limitations period by continuing to investigate a claim for demurrer.	Pleadings - Continue preparing Motion to Strike First Amended Complaint.	Dispositive Motions - Continue preparing demurrer to first amended complaint.	Document Production - Review underlying the materials for production and redact privileged information.	Written Discovery (RFAs & Interrogatories) - Prepare responses to plaintiff's form interrogatories, including supporting denials of numerous admission requests.	
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Analysis/Strategy - Review and analyze case law and statutory requirements re: Objecting to and responding to Plaintiff's Notice of Related cases and Request for Transfer	Pleadings - Continue preparing request for judicial notice additional court order re: application of CCP 340.9 for support of demurrer and motion to strike.	Pleadings - Prepare request to judicial notice audicinity same in further support of demurrer to first amended complaint.	Analysis/Strategy - Review and analyze Statement of Decision re: Demurrer in Northridge Earthquake Litigation use in support of demurrer to First Amended Complaint.	Court-Mandated Conferences - Keview life atio prepare CMC Statement.	Court-Mandated Conferences - Telephone conference with plaintiff's counsel to comply with same.	Analysis/Strategy - Meet and confer requirements in conjunction with upcoming case management conference	Written Discovery (RFAs & interrogatories) - Continue preparing responses to special and form interrogatories supplement with information recently sent by client.	Written Discovery (RFAs & Interrogatories) - Supplement interrogatory responses re: last known addresses for various employees.	Fact investigation/Development - Prepare emails/ memos same.	Fact Investigation/Development - Review court docket re- court's acceptance of improperly filed second amended complaint and telephone conference re: same.	Analysis/Strategy - Review and analyze prohibition against fling second amended complaint absent stipulation or motion to amend.	Fact Investigation/Development - Review and analyze Second Amended Complaint.	Written Discovery (RFAs & Interrogatories) - Prepare emails/ memos re: discovery issues and client review.	Fact Investigation/Development - Telephone conference with Stephen Losh re: provision of responsive pleadings.	whether plaintiff improperly filed Second Amended Complaint without court permission and after demurrer filed to operative complaint as threatened.	notes re: supplementation of discovery responses.  Fact Investigation/Development - Review court file re:	Written Discovery (RFAs & Interrogatories) - Review Aces	Written Discovery (RFAs & interrogatories) - Continue preparing responses to plaintiff's admission requests.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's special interrogatories	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's production requests.	Written Discovery (Kr-As & interrogatories) - Commune preparing responses to plaintiff's special interrogatories	Written Discovery (RFAs & Interrogatories) - Commune preparing responses to plaintiff's production requests.	Cula Kalli Sasouhwoo
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Pleadings - Telephone conference with plaintiff's counsel.	Written Discovery (RFAs & Interrogatories) - Prepare interrogatories and production requests to plaintiff.	Fact Investigation/Development - Telephone conference with Angela Leon re: responding to Liberty's statement to the court; CMC statement and further handling on transferred action.	Pleadings - Continue preparing letter to plaintiffs' counsel re: CCW case filing requirements and letter to client re; case transfer.	Analysis/Strategy - Review and analyze propriety of request to transfer to identified cases.	Pleadings - Review plaintiff's response to Liberty's Objection and response to Notice of Filing Second Amended Complaint, request for judicial notice on same; and response re; request for transfer to CCW.	Written Discovery (RFAs & Interrogatories) - Prepare form interrogatories to plaintiff.	Written Discovery (RFAs & Interrogatories) - Prepare admission requests to plaintiff.	Written Discovery (RFAs & Interrogatories) - Prepare production requests to plaintiff.	Written Discovery (RFAs & Interrogatories) - Prepare declaration of Craig Pynes in support of extensive interrogatories.	Written Discovery (RFAs & Interrogatories) - Continue preparing extensive special interrogatories to plaintiff.	Written Discovery (RFAs & Interrogatories) - Review file and begin preparing extensive special interrogatories to plaintiff.	Pleadings - Continue preparing Objection and Response to Plaintiff's Notice and Request to Transfer Action to CCW.	Pleadings - Continue preparing Objection and Response to plaintiff's Notice of Filing Second Amended Complaint.		to and responding to same.	Analysis/braiegy - review case law is observed in the response to notice of filing second amended complaint.	Analysis/Strategy - Review plaintiff's Notice of Second Amended Complaint and Notice of Related Cases and request to transfer action.	Analysis/Strategy - Review and analyze case law re: court's ability to review letters referenced in complaint that contradict original complaint's allegations for Objections/response to Notice of Filing Second Amended Complaint.	Court-Mandated Conferences - Telephone conference with Angela Leon re: CMC meet and confer and supplement CMC statement re: same.	Pleadings - Draft Objection and response to same.	Bill
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(RFAs & Interrogatories) - Prepare form plaintiff.	Written Discovery (RFAs & Interrogatories) - Continue preparing declaration of necessity in support of extensive special interrogatories.	Written Discovery (RFAs & Interrogatories) - Continue preparing special interrogatories to plaintiff (over 150 interrogatories).	Pleadings - Continue preparing motion to strike second amended complaint.	Dispositive Motions - Prepare points and administer that the court can take judicial notice of orders of other counts; policy; extrinsic letters that contradict the complaint and non-California case law for demurrer.	Dispositive Notions - Review and analyze case law re. court's ability to take judicial notice of orders of other courts; policy; extrinsic letters that contradict the complaint and non-California case law for demurrer.	Analysis/Strategy - Review recent California or Ninth Circuit cases addressing equitable estoppel tolling on CCP 340.9 preclusion of reopened earthquake claims after closure of statutory period for demurrer to second amended complaint.	Dispositive Motions - Continue preparing request for judicial notice in support of demurrer to second amended complaint.	Dispositive Motions - Continue preparing demurrer to second amended complaint.	Dispositive Motions - Continue preparing extensive request for judicial notice in support of demurrer.	Dispositive Motions - Continue preparing demurrer to second amended complaint.	permitted to review documents outside pleadings where plaintiff skips step of moving to amend for demurrer to second amended complaint.	Pleadings - Prepare motion to strike punitive damages and irrelevant allegations from second amended complaint.	Support of demurrer to second amended complaint.	Dispositive Motions - Prepare demurrer to plaintin's second amended complaint.	Dispositive Motions - Review and analyze whether court can take judical notice of letters that directly contradict pleadings, where earlier pleading omits critical fact relied on in subsequent pleading to circumvent demurrer for demurrer to second amend.	Analysis/Strategy - Analyze equitable tolling issues for status report to client.	Analysis/Strategy - Review file and provide requested information for extensive case evaluation.	conference with plaintiff's counsel re: discovery responses and production in light of case transfer and production of claims documents.
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Written Discovery (RFAs & Interrogatories) - Continue	Document Production - Prepare letter to Angela Leon, plaintiffs' counsel, re: document review.	Leon, Beverly Hills Legal Center, re: review of claim files and their production of documents.	preparing extensive special interrogatories to plaintiff (150 special interrogatories).  Two telephone calls with Angela	and motion to strike	to strike.	Written Discovery (RFAs & Interrogatories) - Continue preparing production requests to plaintiff (over 60 requests)	Written Discovery (RFAs & interrogatories) - Continue preparing extensive special interrogatories to plaintiff (over 150 interrogatories) and supporting declaration of necessity	Pleadings - Continue preparing request for Judicial notice and supporting exhibits for same.	written Discovery (RFAS & Interrogatories) - Continue preparing production requests to plaintiff.	Written Discovery (RFAs & Interrogatories) - Continue preparing declaration of Necessity in support of extensive interrogatories to plaintiff.	Written Discovery (RFAs & Interrogatories) - Continue preparing special interrogatories to plaintiff (150 interrogatories).	Written Discovery (RFAs & Interrogatories) - preparing form interrogatories to plaintiff.	Dispositive Motions - Continue preparing demurrer to second amended complaint.	Pleadings - Continue preparing request for judicial notice and numerous exhibits for same.	Pleadings - Continue preparing motion to strike second amended complaint.	Viritten Discovery (RFAs & Interrogatories) - Continue preparing admission requests to plaintiff.	Written Discovery (KrAs & menogatures): Common preparing extensive production requests to plaintiff (almost 70 requests).	Analysis/Strategy - Review whether case law addressing judicial notice for fire insurance policies requires judicial notice of homeowner's policy with earthquake coverage for notice for judicial notice.	Pleadings - Continue preparing request for Judicial Indice and supporting points and authorities.	Pleadings - Continue preparing motion to strike	Pleadings - Review and analyze case law re: moving to strike letters that Liberty waived application of Code of Civil Procedure section 340,9 as false statements and prepare memo to file re: probable success in moving to strike on this basis.	
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Document Production - Review further meet and	Document Production - C counsel and privilege log.	Pleadings - Review the and court website re: plaintin's opposition to Liberty's demurrer and motion to strike and prepare memo to file re: same.	Document Production - Meet with plaintiff's couriser re- production.	preparation for their production to plaintiffs counsel.	Liberty's demurrer and motion to strike second amended complaint.	Dispositive Motions - Prepare reply brief in support of	Pleadings - Review file and court file re: plaintiff's overdue	Document Production - Two telephone conferences with plaintiff's counsel, Angelica Leon, re: review of claim ma documents and discuss redactions of produced docume	document Production - Continue preparing privilege log or documents witheid or redacted.	Document Production - Continue preparing meet a letter to plaintiffs' counsel re: document production	Document Production - Prepare privilege log in relation to redacted documents.	Document Production - Prepare letter to platitut a counset, Angelica Leon, re: responding to her letter regarding supplemental production.	Document Production - Telephon counsel re: document production	Document Production - Review plaint confer letter re: document production.	Analysis/Strategy - Keview very recent case law interparts in the context for reply in Insurance Code 2071 in earthquake context for reply in support of demurrer.	Document Production - Two telephone conterences with plaintiff's counsel, Angelica Leon, re; rescheduling docur production and discovery.	Document Production document production.	Document Production - Review file re: plaintif s counsel is execution of stipulation for protective order and continue preparing letter to Angela Leon re: groundrules for docum production.	Document Production - Telephone contenence with Angleta Leon re: document production.	Docume be prode same.	Written Discovery (RFAs & Interrogatories) - Continue preparing form Interrogatories to plaintiff.	Document Production - Continue preparing admission requests to plaintiff.	Written Discovery (RFAs & Interrogatories) - Continue preparing special interrogatories to plaintiff.	AND
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Written Discovery (RFAs & Interrogatories) - Prepare correspondence to plaintiff's counsel re: responses to form and special interrogatories.	Analysis/Strategy - Prepare memo to file re: above discussions; meet and confer and potential motion for protective order.	Written Discovery (RFAs & Interrogatories) - Telephone conferences with plaintiff's counsel re: extensions to same and special interrogatories (227 special interrogatories); discuss reference of case to mediation and meet and conferes plaintiff's inten	Written Discovery (RFAs & Interrogatories) - Review and analyze underlying claim file materials and prepare responses to plaintiff's form interrogatories, including interrogatory requiring Liberty to justify all of its affirmative defenses.	Written Discovery (RFAs & Interrogatories) - Review and initial preparatio of extensive set of special interrogatories.	Written Discovery (RFAs & Interrogatories) - Begin preparing responses to form interrogatories.	Written Discovery (RFAs & Interrogatories) - Review file materials and analyze on-line information re: corporate information for Liberty Mutual Fire Insurance Company for responding to form interrogatories.	Written Discovery (RFAs & Interrogatories) - Draft extensive meet and confer letter addressing deficiencies in majority of plaintiff's responses to special interrogatories.	Analysis/Strategy - Review and analyze case law re: factual specification and supplementation of plaintiffs economic and other damages assertions for same.	Analysis/Strategy - Analyze case law re: requirement that plaintiff factually specify all bad faith conduct at case inception (not continuing bad faith where underlying arbitration award has been paid) for meet and confer letter to plaintiffs' counsel.	Fact investigation/Development - Review and analyze plaintiff's responses to special interrogatories and production requests re: need for supplementation through meet and confer letter.	Document/File Management - Telephone conference with plaintiff's counsel, Bruce Brusavich and Vibhu Talwar re: extension to respond to outstanding discovery.	Analysis/Strategy - Review and analyze operative complaint and underlying file documents in preparation for analyzing plaintiff's discovery responses and responding to her discovery.	Pleadings - Review plaintiff's opposition to Liberty's motion to strike.	Dispositive Motions - Review plaintiff's opposition to Liberty's demurrer	redacted and discuss with Susan O.  Dispositive Motions - Continue preparing reply in support of Interview of the provided in the support of the provided in t	Ln ltm  Document Production - Review file re: documents witheld or
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Other Case Assessment, Development and Admin Prepare memo to Lisa Hansen re: completed and further						Dispositive Motions - Draft declaration of Lisa Hansen in support of same.	Dispositive Motions - Draft Motion for Summary Judgment based on same.	Dispositive Motions - Analyze case law that bad faith action barred absent economic damages and that emotional distress damages cannot be recovered absent same for motion for summary judgment.	Fact Investigation/Development - Prepare status report to client re: plaintif's responses to form interrogatories and production and summarize documents produced by plaintiff and anticipated workup for Motion for Summary Judgment and Motions to Compel in	Written Discovery (RFAs & Interrogatories) - Continue preparing and combine extensive meet and confer letters addressing plaintiff's deficient interrogatory and production responses and production (20 page letter).	Fact Investigation/Development - Continue review and analysis of documents produced by plaintiff (2000 pages of documents).	Dispositive Motions - Prepare separate statement in support of same.	Written Discovery (RFAs & Interrogatories) - Prepare meet	Analysis/Strategy - Review and analyze case law re: plaintiff's ability to seek bad faith recovery where she refuses to disclose financial documents and whether plaintiff is required to produce underlying fee documents despite	Written Discovery (RFAs & Interrogatories) - Continue preparing extensive meet and confer letter to plaintiff's counsel re: supplemental responses to all her interrogatory responses and production.	Written Discovery (RFAs & Interrogatones) - Review plaintiff's responses to production and voluminous privilege log and begin reviewing and analyzing documents produced by plaintiff.		<u> </u>
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Analysis/Strategy - Prepare memo addressing meet and confer with Vibhu Talwar re: special interrogatories addressing bases for withdrawal of portion and refusal to interrogatories.	Written Discovery (RFAs & Interrogatories) - Lelephone conference with plaintiff's counsel re: production and withdrawal of special interrogatories and prepare memo to file re: same and followup.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to extensive form interrogatories.	Written Discovery (RFAs & interrogatories) - Continue preparing responses to plaintiffs' 227 special interrogatories.	preparing responses to special interrogatories (227 special interrogatories).	Allalysis outaby: The week planning printings only re- necessary nonproduced documents needed to finalize motion for summary judgment and call plaintiff's counsel, Vibju Talwar re, production of same.  Nation Theorems, 19EAA is Internoctories. Continue	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's special interrogatories (227 interrogatories).	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to extensive special interrogatories.	Depositions (Except Experts) - Assist in compiling information for deposition preparation.	Written Discovery (RFAs & Interrogatories) - Review and analyze file and draft responses to plaintiff's special interrogatories (227 special interrogatories).	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiffs form interrogatories.	Fact Investigation/Development - Analyze lexis corporate records and Secretary of State information for use in responding to form interrogatories.	Analysis/Strategy - Analyze case law re: required declaratory support for excessive interrogatories and means and bases to address short of and through motion for protective order for meet and confer and further preparation of meet and confer letter re:	Dispositive Motions - Continue preparing separate statement in support of same.	Dispositive Motions - Continue preparing supporting Hansen declaration in support of motions for summary judgment or adjudication.	Dispositive Motions - Continue preparing motion for summary judgment or summary adjudication.	Written Discovery (RFAs & Interrogatories) - Prepare meet and confer letter to plaintiff's counsel re: same.	Analysis/Strategy - Analyze case law pronibiling outplicative interrogatories; and irrelevant liability and reserve information for same.	Hact investigation/Development - Analyze duplication between plaintiffs different sets of interrogatories and other improprieties in same for meet and confer letter.	Fact Investigation/Development - Continue preparing correspondence to client re: damages claims.	AND THE PROPERTY OF THE PROPER
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Fact Investigation/Development - Prepare memo to tile re: issues resolved/ unresolved in meet and confer and confering relativistiffs demands expectations at trial	Written Discovery (RFAs & Interrogatories) - Telephone conference with Vibhu Talwar re: same and re: settlement.	Written Discovery (RFAs & Interrogatories) - Review meet and confer letters to vibhu Talwar re: supplemental interrogatory responses and production.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to special interrogatories.	Written Discovery (RFAs & Interrogatories) - Review of file re. status of compliance with meet and confer letters and/or agreement to comply with same and discovery workup.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's special interrogatories (227 interrogatories).	Analysis/Strategy - Prepare memos re: MSJ and workup related to Ms. Cessna's prior felony convictions.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to form interrogatories.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to form interrogatories.	Document Production - Review and analyze additional documents produced by plaintiff previously witheld based upon assertion of privilege.	precluding plaintiff's emotional distress damages.	Dispositive Motions - Prepare proposed order granting motion for summary judgment.	Dispositive Motions - Continue preparing declaration of Lisa Hansen in support of same.	Dispositive Motions - Continue preparing separate statement in support of same.	Dispositive Motions - Supplement Motion for Summary Judgment based upon Retainer Agreement and other underlying attorney documentation produced and continue preparing same.	Analysis/Strategy - Analyze case law justifying refusal to provide contentions regarding information disclosed during underlying arbitration; refusal to provide reserve information and private employee information and support for objections based on work	Written Discovery (RFAs & Interrogatories) - Prepare email to Stephanie Dalmatoff re: information re: Dr. Moore IME involvement for Liberty.	Written Discovery (RFAs & Interrogatories) - Substantially supplement responses to plaintiff's special interrogatories (227 interrogatories) to address liability information from underlying action.	Analysis/Strategy - Prepare memo to file re: strategy regarding discovery responses and trial workup.	Fact Investigation/Development - Draft letter to Mr. Talwar re: withdrawal of portion of special interrogatories and additional discovery extension.	
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Document Production - Telephone conferences with Vibhu Talwar re: confirming production of plaintiff's prior medical records and supplemental responses and additional	Written Discovery (RFAs & Interrogationes) - Frepare form interrogatory 17.1 re same.	prepare admission requests to plaintiff.	preparing response to Supplemental Interrogatories.	same.  Militan Discovery (RFAs & Interrogatories) - Continue	Fact Investigation/Development - Prepare memo to file re:	Written Discovery (RFAs & Interrogatories) - telephone conferences with Vibhu Talwar re; supplemental respnoses to special and form interrogatories and production requests and supplemental production; protective order re; claim files, etc. and upcoming d	Written Discovery (RFAs & Interrogatories) - Telephone conference with Vibhu Talwar re: response to meet and confer letters.	denied.	Written Discovery (RFAs & Interrogatories) - Prepare responses to Form Interrogatories addressing fact, witness and document information on majority of admission requests	requests (80 requests).	Written Discovery (RFAs & Interrogatories) - Review of file and continue preparing obliections to plaintiff's admissions	Written Discovery (RFAs & Interrogatories) - Begin preparing responses to plaintiff's admissions requests.	correspondence to client enclosing same.	Written Discovery (RFAs & Interrogatories) - Prepare	Written Discovery (RFAs & Interrogatories) - Continue	Written Discovery (RFAs & Interrogatories) - Prepare letter to V. Talwar confirming discovery extension.	special interrogatories.	Written Discovery (RFAs & Interrogatories) - Review file and call Vikhu Talwar re: further extension on response date for	Written Discovery (RFAs & Interrogatories) - Review additional form interrogatories and extensive requests for admissions and supporting declaration of necessity propounded by Vibhu Talwar.	Fact investigation Development - everyware conserve with Vibhu Talwar re; privileged documents witheld from discovery.	Written Discovery (RFAs & Interrogatories) - Continue preparing further meet and confer letter to plaintiff's counsel, Vibhu Talwar, re: supplemental responses to special interrogatories and production requests.	Written Discovery (RFAs & Interrogatories) - Prepare further meet and confer letter to plaintiff's counsel, Vibhu Talwar re: supplemental discovery responses or letter addressing compliance and extension of motion to compel cutoff dates.	alle Item Coortpace
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Analysis/Strategy - Prepare correspondence to client re: pre- trial workun	Analysis/Strategy - Prepare memo to file re: same.	Other Trial Preparation & Support - Review and analyze motions in limine, expert disclosure and other pre-trial information for trial preparation.	Written Discovery (RFAs & Interrogatories) - Prepare Supplemental Interrogatory to plaintiff.	for Dennis Cessna deposition, review supplemental document production for depo and continue preparing for Dennis Cessna deposition.	Depositions (Except Experts) - Review of file re: documents	Depositions (Except Experts) - Begin preparing outline for Dennis Cessna deposition.	Depositions (Except Experts) - Review file and begin preparing to depose Diane Cessna's husband.	Analysis/Strategy - Prepare email/ memo to file re: same.	written biscovery (kt.rxs a interrugacines) - receptions conference with Vibhu Talwar re: mutual supplementation of discovery responses.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to form interrogatories, set two, addressing denied admission requests (most of them).	Other Written Motions/Submissions - Continue preparing responses to admissions requests (80 requests).	Written Discovery (RFAs & Interrogatories) - Continue preparing production requests to plaintiff.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiffs form interrogatories, including supporting denial of most of plaintiffs 22 admission requests.	Written Discovery (RFAs & Interrogatories) - Prepare memo to file re: same.	Written Discovery (RFAs & Interrogatories) - i elephone conference with Vibhu Talwar re: his perceived problems with Liberty's discovery responses.	Written Discovery (RFAs & Interrogatories) - Continue preparing production requests to plaintiff.	Written Discovery (RFAs & Interrogatories) - Telephone conference with Vibhu Talwar re: supplementation of discovery responses and production.	Written Discovery (RFAs & Interrogatories) - Prepare document request/ subpoena re: additional documents supporting plaintiffs economic loss claims.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's admission requests (80 requests).	Written Discovery (RFAs & Interrogatories) - Continue preparing meet and confer letter re: plaintiff's agreement regarding supplemental production and supplemental interrogatory responses.	Written Discovery (RFAs & Interrogatories) - Prepare supplemental meet and confer letter re: plaintiff's further production of medical records; supplemental interrogatory and production responses/ privilege log.	
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Fact investigation/Development - Begin preparing	preparing responses to plaintiff's admission requests.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's requests for admissions.	Fact Investigation/Development - Prepare email/ memo re: further workup/ discovery re: Remedy Temp documents.	ract investigation beveroptitetti Review unvertigate in materials re; information on previously subpoenaed records from Remedy in the underlying action to obtain same directly from Datamed.	Fact Investigation/Development - Continue preparing correspondence to client terms to the continue preparing the correspondence to client terms to the continue preparing the correspondence to client terms to the continue preparing the correspondence to client terms to the continue preparing the correspondence to client terms to the correspondence to the	Fact investigation/Development - Telephone conference with Kathleen Casey re: Remedy Temp documents.	Depositions (Except Experts) - Return to office from Dennis Cessna deposition.	Depositions (Except Experts) - Take deposition of Dennis Cessna.	Depositions (Except Experts) - Drive to deposition of Dennis Cessna in Torrance.	Document Production - Meet with Vibhu Talwar re: supplemental responses to plaintiffs discovery.	Document Production - Continue preparing correspondence to Vibhu Talwar re: supplemental production of underlying invoices.	Document Production - Continue preparing production requests to plaintiff.	Fact Investigation/Development - Continue preparing correspondence to client re: summarizing additional document production.	Document Production - Prepare correspondence to Vibhu Talwar re: production of legible underlying invoices.	Written Discovery (RFAs & Interrogatories) - Prepare subpoena to Remedy Temp Services.	Fact Investigation/Development: Review file materials re: all documents related to Remedy Temp and whether it provided connection to plaintiff's employment with Dayle McIntosh Center:	Fact investigation/Development - Telephone conference with Kathleen Casey's office re: discovery investigation to Dayle McIntosh Center.	Analysis/Strategy - Prepare memo to file re: substantial evidence disclosed addressing plaintiffs lie on employment application and impeechment value or potential substantial case impact of same.	Analysis/Strategy - Prepare memo to file analyzing adequacy of same and need for motions to compet.	Analysis/Strategy - Review and analyze additional documentation (over 100 pages) produced by plaintiff (previously withed under privilege log); supplemental privilege log; and supplemental interrogatory responses and summarize same in correspondence to	
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Fact Investigation/Development - Prepare Status letter to	Court-Mandated Conferences - Prepare Notice of Court's Ruling at Status Conference and memo to file re: hearing.	Status Conference.	Court-Mandated Conferences - Attend Status Conference.	CVIII GIVG.	Court-Mandated Conferences - Drive to downtown Status	requirements and arrange for local service on Century Surety in compliance with same.	Analysis/Strategy - Review and analyze Ohio service	Court-Mandated Conferences - Review file and prepare for	Fact Investigation/Development - Review means to serve same/ acknowledgement letter for Ohio service.	Fact Investigation/Development - Call DDS re: same.	for Century Surety.	Fact Investigation/Development - Telephone conference with DDS re: status of effecting service on Century Surety.	Pleatings - Prepare assignment of woods claims, worses of action and merge and supplement settlement agreement and release to address same.	SUMMORS.	Pleadings - Continue preparing CMC Statement.	Surety.	Analysis/Strategy - Search process location(s) for Century	Analysis/Strategy - Prepare memo to file re; upcoming dates and file workup.	Pleadings - Review tile re: CMC information and prepare CMC statement.	Fact Investigation/Development - Review file re: supplementation re: Century Surety policy information and continue preparing Cross-complaint and Summons on same.	Pleadings - Prepare Summons for Cross-complaint	action).	Pleadings - Review and analyze availability of additional causes of action against Kingston and Century Surety on cross-complaint, supplement additional causes into same and continue working on preparation of same (ten causes of	Pleadings - Draft 12 cause of action cross-complaint against Kingston and Century Surety.	Analysis/Strategy - Analyze case law re: cross-compaint against Kingston and Century Surety.	Analysis/Strategy - Keview and analyze uncertying me materials for information for cross-complaint against Kingston and Century Surely.	Settlement/Non-Binding ADR - Telephone call from Kathleen Casey re: settlement.	
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Settlement/Non-Binding ADR - Continue preparing declaration re: continuing OSC hearing based upon	Settlement/Non-Binding ADR - Prepare declaration per clerk's request to continue OSC hearing.	Settlement/Non-Binding ADR - Prepare letter to Kingston's counsel re: finalizing settlement process and continuing OSC hearing.	Settlement/Non-Binding ADR - 2 telephone conferences with Adam Salamoff and David Pierce re: finalizing settlement and remission of settlement payment and continuing OSC hearing.	Settlement/Non-Binding ADR - Review letter and signed settlement from client and prepare letter to David Pierce re: completion of settlement documents and remission of payment.	Settlement/Non-Binding ADR - Review letter from client re: settlement and provide requested documents.	Settlement/Non-Binding ADR - Prepare email/ memo to file re: followup.	Settlement/Non-Binding ADR - Telephone conference with Adam S. at David Pierce's office re: settlement payment and mutual release execution.	Settlement/Non-Binding ADR - Review letters/ emails re: progress/ status of settlement execution and payment.	Settlement/Non-Binding ADR - Review file re: status and prepare email/memo to file re: same.	Court-Mandated Conferences - Review file in preparation for attending CMC hearing.	Court-Mandated Conferences - Leiephone conference with Century Surety's counsel re: CMC going off calendar and scheduled OSC.	Document Production - Prepare correspondence enclosing additional copies of settlement documents to Century Surety and Kingston.	Settlement/Non-Binding ADR - Prepare correspondence to Kingston and Century Surety's counsel re: proposed settlement	Court-Mandated Conferences - Review file and prepare CMC statement for upcoming hearing.	Settlement/Non-Binding ADR - Review file re: status or settlement in light of upcoming FSC and prepare email/ memo re: attendance at same pending completion of settlement process.	Written Discovery (RFAs & Interrogatories) - Begin preparing special interrogatories to cross-defendants.	Analysis/Strategy - Review file re: status of service of Century Surety and receipt of proof of service for court.	Fact Investigation/Development - Continue preparing status letter and notice of ruling re: CMC hearing.	ļ
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Dispositive Motions - Review and analyze case law re: insurer not responsible for poor contractor work, unless it	Other Case Assessment, Development and Admin Prepare memo to file re: pretrial dates per court and court- memo.	Document Production - Prepare correspondence to plaintiffs' and Service Master counsel re: production of Service Master documents and mediation.	Document/File Management - Prepare status letter to Liberty.	Court-Mandated Conferences - Appear at Case Management Conference in Van Nuys.	Other Discovery - Review underlying file documents re: documentation or information regarding Service Master entity involved with 1999 water claim and Mercury Casualty claim.	Document Production - Review file and prepare productions requests to plaintiffs.	Dispositive Motions - Continue preparing demurrer to all causes of action in complaint.	Document/File Management - Retrieve Jams and ADR information on judges proposed for private mediation for plaintiffs' counsel.	Court-Mandated Conferences - Review file and prepare for CMC conference.	Dispositive Motions - Begin drafting demurrer to all causes of action.	Pleadings - Telephone conference with plaintiff's counsel restipulating to remand case to state court.	Pleadings - Review and analyze case law precluding liability for nuisance where Liberty did not cause the nuisance for same.	Dispositive Motions - Review and analyze case law precluding cause of action for negligence based on alleged deficient claims handling for same.	Dispositive Motions - Review case law prohibiting bad faith liability based on legally conclusory laundry list of allegations devoid of factual support for same.	Dispositive Motions - Review and analyze case law addressing lack of bad faith based solely upon delay in providing benefits or when genuine dispute exists as to valuation for demurrer.	Dispositive Motions - Review and analyze case law re: payment of benefits on a replacement cost policy precludes breach of contract for demurrer.	Dispositive Motions - Review and analyze policy for use in demurrer and/or Motion for Summary Judgment.	Dispositive Motions - Review original complaint for demufrer re: conflicting allegations.	Pleadings - Draft Motion to Strike punitive damages.	Pleadings - Analyze case law re: striking allegations of pattern and practice or Liberty's adjustment of other claims for motion to strike.	Court-Mandated Conferences - Telephone conference with plaintiffs' counsel re: CMC conference as required by local rules.	Line Item Description
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Written Discovery (RFAs & Interrogatories) - Review file and	Written Discovery (RFAs & Interrogatories) - Review and analyze plaintiffs' production requests.	between pleadings in addressing demurrer.	Dispositive Motions - Review case law re: count's ability to take judicial notice of documents attached to complaint for documents and rely on conflicts.	Add AN North Control of the Control	meetings with Liberty.	Analysis/Strategy - Continue preparing case summary for	preparing extensive special interrogatories to all pariture re the 3 claims of damage (almost 200 interrogatories).	Written Discovery (RFAs & Interrogatories) - Continue	meeting with Liberty personel.	Analysis/Strategy - Continue preparing case summary for	with Home Office.	Ciner Case Assessment, Development and Admin.	complaint (all causes of action).	Dispositive Motions - Continue preparing demurrer to	demurrer.	same merely echo legal precedent for supplementation of	45 subparagraphs in amended complaint to demonstrate that	Dispositive Motions - Neview and analyze case law and analyze case law	Dispositive Motions - Review and analyze case law	perioritied by the financials contractors for adplications to	precluding breach of contract and bad faith for deficient work	Dispositive Motions - Review and analyze case law	Written Discovery (RFAs & Interrogatories) - Continue	allegations.	damages allegations and irrelevant and inflamatory	documents to be produced to same.	Document Production - Continue preparing correspondence to plaintiffs and ServiceMaster's counsel re: ServiceMaster documents production from Liberty's file and review	CHAIR COMMISSION CONTRACTOR CONTR	compliance with same.	Same re: document production and enclosing documents in	production.	from ServiceMaster counsel re: mediation and document	interrogatories.	declaration of necessity in support of voluminous special	Written Discovery (RFAs & Interrogatories) - Prepare	admissions requests to same.	Written Discovery (RFAs & Interrogatories) - Prepare	voluminous special interrogatories to plaintiffs.	Written Discovery (RFAs & Interrogatories) - Prepare	plaintiffs' laundry list of allegations merely repeat bad faith case law	to thoroughly investigate claim and case law showing that	Dispositive Motions - Review and analyze case law this entirest insurer can not be liable on a first party claim for taking time	that an a section and analyze case law that an	Ln ltm
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Pleadings - Prepare Demand to all parties for Prior	Written Discovery (RFAs & Interrogatories) - Prepare form	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiffs production requests.	Jeffrey Wulkan, ServiceMaster's counsel re: case workup prior to Liberty's entry into case.	Written Discovery (RFAS & mierrogatories) - Commune preparing extensive production requests to plaintiffs.  The inchange of the production	preparing extensive special interrogatories to plannins and supporting declaration of necessity.	Document Production - Prepare subpoena to Dr. Gary Ordog (McLaughlins' physician re: alteged mold problems) Written Discovery (RFAs & Interrogatories) - Continue	Office case Assessment, Development and American Preparation of status report to client re, plantiffs document production; responses to form interrogatories and further workup.	Written Discovery (RFAs & Interrogatories) - Prepare initial responses to form interrogatories.	Document Production - Review file for document production and responding to form interrogatories.	Written Discovery (RFAs & Interrogatories) - Begin preparing responses to plaintiffs form interrogatories.	Written Discovery (RFAs & interrogatories) - Continue preparing admission requests to plaintiffs re damages and repairs.	Document Production - Continue preparing Stipulation and Protective Order re; release of Liberty confidential underwriting and claims documents.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to production requests.	Written Discovery (RFAs & Interrogatories) - Continue preparing responses to plaintiff's special interrogatories.	Analysis/Strategy - Further preparation on demurrer re facts not in original complaint	Document Production - Prepare responses to plaintiffs' production requests (over 30).	Analysis/Strategy - Prepare memo to file re: responsive pleading workup.	Pleadings - Continue preparing motion to strike.	Dispositive Motions - Continue preparing demurrer.	Pleadings - Continue preparing motion to strike punitive and other extraneous damages and irrelevant and inflammatory allegations.	Dispositive Motions - Continue preparing demurrer to all causes of action on multiple theories.	Document Production - releptione contentive with plantain so counsel, Joshua Haffner re: ServiceMaster information and mediation.	Document Production - Prepare Stipulation re: protective order in anticipation of release of Liberty Claim and underwriting file materials.		Kem Wooley Craig S Pynes
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Pleadings - Draft Reply brief in support of Motion to Strike

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Pleadings - Review and analyze case law precluding plaintiffs' nuissance and attorneys fees allegations.

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Fact Investigation/Development - Continue preparing correspondence to client re: hearing on responsive pleadings and further workup.	McLoughlins' treating physcians.	Ordog for Danielle McLoughlin (approximately 500 pages).  Document Production - Prepare subpoenas to four	Fact Investigation/Development - Begin reviewing and analyzing extensive medical records produced by Dr. Gary	workup.	Analysis/Strategy - Continue preparing correspondence to client re; demurrer and motion to strike hearing and further	demurrer and motion to strike.	motion to strike.	Dispositive Motions - Appear at hearing on demurrer and	motion to strike in Van Nuys.	hearing on demurrer and motion to strike.	Dispositive Motions - Prepare correspondence to client re:		Dispositive Motions - Prepare for hearing on demurrer.	evaluation report (27 pages).	motion to strike.	Pleadings - Continue preparing reply brief in support of	Dispositive Motions - Continue preparing reply in support of	Subpoena.	case letter to client.	Analysis/Strategy - Continue preparing initial evaluation of	Fact investigation/Development - Leispinotie currieterice with AAA Floors re: production of documents regarding repairs to plaintiffs' floors in 1998.	motion to strike.	Strike.	Pleadings - Continue preparing Reply in support of Motion to	Reply in support of motion to strike.	Pleadings: Analyze case law re: whether a claim for misrepresentations are sufficient to premise a claim for numitive damages, and, if so, under what circumstances for	demurrer to amended complaint.	Dispositive Motions - Continue preparing reply in support of	Lispositive inductis "review and analyze case for its plaintiffs' conclusory allegations of derial of benefits can be disregarded where contradicted by factual allegations elsewhere in their amended complaint for same.	policy provisions re: notice requirements as prerequisite to instituting present lawsuit for same.	same for reply in support of demurrer.	Dispositive Motions - Review and analyze plaintiffs' statute of limitations arguments; tolling and equitable estoppel for		Id Prvd Line Item Description
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